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January 29, 2020

BY ECF

Hon. Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Schulte*, S2 17 Cr. 548 (PAC)

Dear Judge Crotty:

We respectfully ask the Court to direct the government to identify for the Court and for defense counsel, as soon as possible, the specific language in the MCC notebooks and other prison documents that the government will claim at trial constitutes “classified information” or information “relating to the national defense.” The government’s filings on this issue do not state with specificity what exact language it considers to be national defense information. Specificity is necessary; only then will the Court be able to properly rule on the admissibility of the information at issue in Count Four of the second superseding indictment.

We further request the government be directed to identify the form (e.g., classified, redacted, altered, etc.) in which these documents will be presented to the jury, and whether that information will be kept from the public and the press.

Respectfully submitted,

/s/
Edward S. Zas & Sabrina P. Shroff
Counsel for Joshua A. Schulte